

Buckner, Edwin

From: Larry Young <lyoung@a-tec-recycling.com>
Sent: Tuesday, March 07, 2017 09:50
To: Buckner, Edwin
Subject: FW: Edwin
Attachments: Edwin Buckner 03.06.17.docx
Categories: EZ Record - Shared

Hello Mr. Buckner,

We would just like to follow up before we turn "the beast" loose on the commercial recycling of CRT glass. A-TEC Recycling has been around too long (20+ years) not to know that it is always important to "dot all our i's and cross all our t's". We believe our process is revolutionary in getting lead out of CRT glass and we plan on using it to clean up stockpile sites all across this country and help save our lands of all this pollution from heavy metals. Mike Seiler heads up not only the designs and the manufacturing of our equipment (including our fluorescent lamp machine), but he also is in charge of making sure our direction from the CFR regulations is spot on for A-TEC Recycling. I have attached a letter on how we see "our path" with this new CRT process and make sure not only that you are aware of it, but are ok with it. I attached a letter from Mike just to reiterate our plans and thoughts on this new process and how we expect to move forward. Please let us know of anything we should look at changing otherwise, we expect to move forward starting this Spring in offering to use this process to clean up sites around the Midwest and hopefully beyond as an alternative to Doe Run.

Thanks again for all your help and we look forward to working with you on these projects.

Larry Young

President

A-TEC Recycling, Inc.

RCRA 03/07/2017



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Dear Mr. Buckner:

03/06/17

As we near commercial operation of our CRT glass lead recycling system, I reach out to you once again to ask you to please provide guidance to be sure that we follow the laws correctly.

In our last correspondence dated 03/17/2016, you advised that if we demonstrate that when the glass exits the system it meets TCLP and LDR, then disposal in a solid waste landfill or use constituting disposal would be permissible.

From that statement I conclude that, after being processed through our lead recycling system, if we demonstrate the glass meets the requirement of 40 CFR part 261 (5 mg/L TCLP), the glass is considered to be a solid waste, as opposed to a hazardous waste, and the weight of the glass is not included when making the quantity determination of generator status in 40 CFR part 262. Additionally, I conclude that since the glass is a solid waste and if we demonstrate the glass meets the requirement of 40 CFR part 268 (.75 mg/L) then, if the glass is used in use constituting disposal, the rules of 40 CFR part 266 are not applicable.

I humbly ask that you please look at my conclusions and confirm that I am interpreting this correctly.

Best regards, Mike Seiler